

**Department of Agriculture
and Rural Development**

VETERINARY SERVICE

3 December 2002

Dear Ms Stratmoen

Thank you for your letter of 11 October, and Dr Urban's report of his audit of Eurostock Ltd (Establishment Number 9014) carried out by him during his visit to Northern Ireland from 2-7 August 2002.

I have attached a detailed reply to the points made by Dr Urban in relation to Establishment 9014, though we accept your conclusions in relation to re-listing. While the Department did formally request this audit it was not entirely of its own volition. Political representations were made through diplomatic channels in London and Dublin to support this case; and in many ways what the Department did was to facilitate an audit, bearing in mind that the USA team had already planned to be in Ireland. In any other circumstances the Department would not have facilitated such a request.

The Department's track record in this area is excellent and it had taken all reasonable steps to ensure that this plant complied with the standards expected and addressed previously identified deficiencies. While the result of this exceptional case is accepted we find it hard to accept the consequential decision to withdraw approval for prelisting establishments. This conclusion and action comes as a considerable surprise and shock for a number of reasons. First it is at variance with previous full system audits of our Meat Hygiene systems carried out by Dr Singh during February 1999 and by Dr Bolstad during June 2000 and December 2001. Secondly as you state in your letter this was a "special audit" of an individual establishment and not a full Meat Hygiene system audit and the extrapolation of the findings to our system in general is unfair and unreasonable.

We fully believe that the authority for the Department of Agriculture and Northern Ireland and Rural Development to pre-list establishments should be maintained until the system inspection proposed for June 2003 and we request an urgent discussion about this matter before a decision is confirmed.

Yours sincerely



R M HOUSTON
Chief Veterinary Officer

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Ms Sally Stratmoen
Acting Director
Equivalence Division, Office of International Affairs
USDA, Food Safety & Inspection Service
Washington DC 20250
United States of America



INVESTOR IN PEOPLE

Dundonald House, Upper Newtownards Road, Belfast BT4 3SB
Telephone (028) 90 Fax (028) 90
Website: www.dardni.gov.uk

Annex A

The Government of Northern Ireland wishes to make the following comments on the report received from FSIS of Dr Urban's audit carried out in Northern Ireland during early July 2002.

Establishment audit (page 4, last line)

Establishment 9014 was conducting processing operations, but these were entirely unrelated to the SSOP and HACCP plans for the product that the establishment intended to export to the US. No product had been produced for US export since January 2001, some 18 months prior to this inspection.

Establishment Operations by Establishment number (page 4)

No fresh/frozen sausage for either home/export market was being produced in this establishment at the time of this audit.

SANITATION CONTROLS (page 4)

We note that Dr Urban reported that the deficiencies relating to water supply reported by Dr Bolstad in his audit of December 2001 had been corrected to his satisfaction.

Sanitation Standard Operating Procedures (page 4)

1. This comment relates to a piece of processing equipment that was being held in a store and that had not been in use for some time. While accepting that the equipment was not cleaned properly as it should have been if the detail of the SSOP had been followed, the SSOP stated that the equipment should be washed and sanitised again before being used. This deficiency did not therefore present any imminent risk to the hygiene of the process.
2. This relates to point 1. We fully accept that the equipment should have been washed and sanitised properly before being put into storage.
3. We disagree that the SSOP records were not descriptive enough. The statement that the floor is dirty should be adequate for an operational record. The required result is that the non-compliance is corrected, namely a floor which is clean. Further descriptive terms should not have a bearing on that outcome.
4. This comment relates to small specks of dirt observed on the cutting tables at the time of pre-sanitation checks. Our staff who were carrying out the check at the time of the audit identified the problem, uncovered the cause and as Dr Urban's report states had the non-compliance corrected immediately by the establishment management. This new hazard having now been identified a corrective action can be put in place. We believe this is how the system is supposed to work in order to prevent the risk of any contamination. We are concerned that you do not consider this to be the case especially as in attachment A, you confirm that the 'data collection instrument' addresses pre-operational sanitation adequately. In fact the only non-compliance you record

with regard to the SSOP data collection instrument is that the documentation is not completed daily. This is not an unsurprising finding given that no product for US export has been produced in the plant for 18 months.

Establishment Grounds and Pest Control (page 5)

1. As stated, our officials are aware that the offal area required upgrading and were working with the establishment prior to the audit to correct this deficiency.
2. The moth was found on the surface of the incorrectly sanitised piece of stored equipment mentioned above. It is possible that the equipment may have been removed from the store in order to access other equipment and that the moth had found its way under the machine cover before the machine was returned.

Establishment Construction/Maintenance (page 5)

The non-compliances listed relate to routine on-going maintenance which as the audit report states were scheduled for correction.

Dressing rooms/Lavatories

The waste receptacle had been moved from beside the wash-hand basin to outside the door.

Equipment and Utensils

1. The dirty trays were observed by the establishment employee during her pre-operation check. She corrected the non-compliance immediately, before action by the establishment official was necessary, demonstrating that the pre-operational check was effective.
2. The conveyor belt in question had been removed from production earlier that week by the establishment officials. It was not in use at the time of the audit and was awaiting removal from the work area for the required maintenance to be carried out. It is our view that the presence of this belt is irrelevant to this audit.

Employee Hygiene

Working clothes were observed in the street clothes dressing rooms by the establishment employee during her pre-operational check. Again she corrected this non-compliance without reference to the establishment official demonstrating that the system pre-operational checks were effective.

SLAUGHTER/PROCESSING CONTROLS (page 6)

We note that Dr Urban found that the meat inspection system of Northern Ireland had controls in place to ensure adequate pre-processing trim, processed product reinspection, identification of ingredients, packaging materials, laboratory

confirmation, label approvals, inspector monitoring, processing equipment and post-processing handling.

HACCP Implementation (page 6)

1. While accepting that the HACCP plan did not include verification requirements for calibration of process monitoring instruments and a review of records, it did include direct observation of monitoring activities and corrective actions. These requirements had been introduced by FSIS since the last review and validation had been carried out of this HACCP plan during the year 2000.
2. We accept that the corrective action requirements for identifying and eliminating the cause of the deviation were not fully addressed.
3. Dr Urban accepted during the audit that an acceptable pre-shipment review was in place but that it was not laid out as he would have liked it. We would strongly question whether this can thus be considered to be a non-compliance.

ENFORCEMENT CONTROLS (page 7)

Inspection System Controls

We note that Dr Urban found DARDNI inspection system controls were adequate to ensure that products produced by the establishment were wholesome, unadulterated and properly labelled.

The failure to denature the inedible product resulted from a DARD interpretation of the legal position that it was inappropriate to rigorously enforce a matter which is currently the subject of court proceedings at a European and national level.

2. The establishment representatives had been informed earlier in the week of the audit by officials of the corrective actions required and had undertaken to carry out the work.

These comments relate only to establishment 9014. No HQ audit of Northern Ireland's Meat Inspection System was carried out and no laboratories or other establishments were visited as would be normal practice when carrying out a system audit. I must therefore express my view that the decision made by FSIS that they will accept no further establishment certifications by the government of Northern Ireland is unwarranted.